

FILED

2021 NOV -2 PM 2: 00

CLERK, US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY

[Signature]

SEALED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA

v.

**MATTHEW NELSON TUNSTALL,
ROBERT REYES, JR., and
KYLE GEORGE DAVIES,
Defendants.**

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CRIMINAL NO.

A21 CR 223 LY

MOTION TO SEAL INDICTMENT

TO THE HONORABLE JUDGE OF SAID COURT:

The United States of America, by and through the undersigned Trial Attorneys from the Public Integrity Section of the U.S. Department of Justice's Criminal Division, respectfully requests that the Court seal all documents relating to the Indictment of Matthew Nelson Tunstall, Robert Reyes, Jr., and Kyle George Davies (collectively, the "Defendants"), filed in the above-styled cause. These documents include the Indictment, the Record of Grand Jurors Concurring, the Personal Data Sheets, the Order for Bench Warrants, as well as this Motion to Seal the Indictment. As reason for such request, the United States submits that information contained in these documents should be sealed so as to safely effect the arrest of the Defendants and avoid a risk of flight.

The United States seeks leave to share the arrest warrants and Indictment with the appropriate U.S. law enforcement authorities to affect their arrest, as some of the Defendants may be located in other jurisdictions. A file-stamped copy shall be issued to the affiant and the United States.

Respectfully submitted,

Corey R. Amundson
Chief, Public Integrity Section



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